

Message

From: Nierenberg, Kara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=06ACA557DB7D46CEBC0375C86E3DAF46-NIERENBERG,]
Sent: 11/22/2022 4:56:44 PM
To: Bruce Thompson [brucet@demaximis.com]
Subject: RE: Hopedale railyard - First NMI delivery

DRAFT RESPONSES IN RED BELOW

Kara Kelly Nierenberg, PE
Massachusetts Superfund
617-918-1435

From: Ed Burt <eburt.hd@gmail.com>
Sent: Monday, November 21, 2022 9:02 AM
To: Nierenberg, Kara <Nierenberg.Kara@epa.gov>
Subject: Hopedale railyard - First NMI delivery

Hi Kara,

Thank you very much for taking the time to speak with me this morning.

To recap the call, last Thursday's first delivery was a goal of 6 trucks, with the material in zipper shut bags. Two types of bags are being evaluated. During the truck to gondola transfer the zipper opened on 3 bags resulting in 1 gallon of soil requiring clean-up, (per Appendix C in the procedures).

Problematic, but it was good that the key people were there, and are evaluating why this happened. Yet, we (Hopedale) are still concerned about the lack of Zone II specific measures. A follow-up regarding the truck route will also be done.

Below are the questions/comments that I had mentioned we had during that call.

Thanks again, and please do keep us posted.

Ed Burt

508 259 1181

Hopedale questions/comments. In short, anything to report regarding the:

- Trucking route
- Soils transport from truck to train
- Overall process and emergency readiness

More specifically, the following are some of the questions and concerns we have, and have received from the community.

Regarding the truck route:

1. The Hopedale Police Chief did forward Bruce Thompson's email notice. We only have the Hopedale contacts. Was Milford corrected in the documentation and notified? Does not apply to Hopedale

2. Any issues with the area being under construction just before the railyard entrance? Bruce?
3. Any issues regarding the Milford downtown route? Bruce? – also not Hopedale's concern
4. A resident commented about a truck on Route 140, coming north. A route that is not on the NMI plan. Was that one of the NMI trucks? May have been an empty truck returning to Concord – trucks are doing laps. Currently 3 (?) trucks, making 3 trips each daily?

Regarding the soils, and packaging:

1. Any malfunctions in the bags during transit? No
2. Any malfunctions in the bags going from truck to train car - First bag and all bags to fill the rail car? Yes, as noted above, 3 bags opened along the zipper during loading the rail cars.
3. Any residue outside of the packages in the trucks, or the rail car? Approximately 1 gallon of soil released. Spill contingency plan followed and emergency response contractor on-site WHEN to address - CONFIRM

Regarding the process:

1. When the truck was loaded in Concord, how were the materials validated as safe to be transported? Trucks weighed, bags, sealed, material has been pre-approved by landfill based on pre-disposal sampling characterization
2. Was the same process repeated when arriving in Hopedale to ensure that there were no issues during the truck transport? Bruce- does anyone check the truck contents prior to dumping?
3. After transporting the bags from truck to train car, was a similar process repeated to ensure nothing happened in the truck to rail car move? (For both the truck and the railcar) The transfer is observed – question, if someone was not on-site to oversee this work would the driver get out to confirm that all material was deposited in the train car? Is there another person around to confirm there is no release?
4. What is the daily oversight and documentation process? Who confirms that what was expected actually happened? Waste manifests move with the waste from when it leaves NMI until it arrives at final disposal location.

Regarding the emergency procedures:

1. Was a test of these procedures done, simulating various situations? The spill response team responds to release like this frequently and is well trained on how to respond.
2. Were the trucks splash guards or a similar protection in place? NA – see notes that hydraulic lift on the tailgate was turned off so that waste can move “naturally” as the truck bed is raised, which should minimize twisting of the bags
3. Were ground barriers, rail pans and/or additional ground level protections in place? No – but the railyard plans to construct a concrete pad opposite the loading area for the full-scale implementation (spring/summer 2023) to protect ground surface – could we ask someone to put down some weighted poly sheeting for the time being?
4. Were all personnel knowledgeable in what to do if there was a spill? Yes – spill response was dealt with as planned in Plan

There are a number of local officials, with various oversight responsibilities that would like to see this operation in person. How can we make that happen? Bruce – can I send them the videos? These seems like the best way to address this concern.